## Remarks

Applicants respectfully request reconsideration of this application as amended. No claims have been amended. No claims have been cancelled. Therefore, claims 10-16, 24 and 26-31 are presented for examination.

Claims 10-16, 24 and 26-31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Umen et al. (U.S. Patent No. 6,854,086) in view of Shoup et al. (U.S. Patent No. 7,076,502). Applicants submit that the present claims are patentable over Umen in view of Shoup.

Umen discloses a document production system for preparing documents and managing a database of information pertaining to investigational studies of medical products. See Umen at Abstract. Umen further discloses a data management user interface (DMUI) that provides section headings that may be included in the document templates for identifying various sections of each document. The DMUI provides a template selection menu that allows a user to select a document template. For example, the user may select an FDA report template from the menu. See Umen at col. 17 ll. 24-55.

Shoup discloses a record management system that generates a layout mapping. The layout engine builds the layout mapping in a layout mapping storage unit by utilizing retrieved formatting information and the record structure foundation formed by a query map and master table index. See Shoup at col. 16 ll. 32-39.

Claim 1 of the present application recites each layout identifier controls placement of each data record within each format region. Applicants submit that Umen and Shoup each fail to disclose or suggest a layout identifier that controls placement of a data record within a format region. In fact, the Office Action admits that Umen does not disclose or suggest a

Docket No. 003594.P016 Application No. 09/475,963 layout identifier that controls placement of a data record within a format region. See Office Action at page 4, 11. 7-8.

However, Shoup has been cited as disclosing a layout identifier that controls placement of a data record within a format region. Id. Applicants maintain that Shoup does not disclose or suggest such a feature. Shoup discloses a layout engine building a layout mapping utilizing retrieved formatting information. Applicants submit that the *formatting information* utilized by the layout engine in Shoup is *not equivalent* to a *layout identifier*, which is claimed as indicating a type of data included within a data record. Particularly, there is no disclosure or suggestion in Shoup that the formatting information indicates a type of data included within a data record. Instead, the formatting information, at best, is analogous to the layout parameters claimed in applicants' claim 1.

Because both Umen and Shoup fail to disclose or suggest a layout identifier that controls placement of a data record within a format region, any combination of Umen and Shoup would also fail to disclose or suggest a layout identifier that controls placement of a data record within a format region. Therefore, claim 1 is patentable over Umen in view of Shoup.

Claims 11-16 depend from claim 10 and include additional features. Thus, claims 11-16 are also patentable over Umen in view of Shoup.

Claim 24 recites each layout identifier controls placement of each data record within each format region. Accordingly, for the reasons described above with respect to claim 1, claim 24 is patentable over Umen in view of Shoup. Since claims 26-31 depend from claim 24 and include additional features, claims 26-31 are also patentable over Umen in view of Shoup.

Docket No. 003594.P016 Application No. 09/475,963 Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: <u>3/5/07</u>

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